

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
INVACARE CORPORATION, <i>et al.</i> , ¹)	
)	Case No. 23-90068 (CML)
Reorganized Debtors.)	(Jointly Administered)
)	

MOTION TO WITHDRAW AS COUNSEL FOR REORGANIZED DEBTORS

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at <https://ecf.txsb.uscourts.gov/> within twenty-one days from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

Baker & Hostetler LLP files this Motion to Withdraw as counsel for the Reorganized Debtors and respectfully state as follows:

1. The Reorganized Debtors have been represented in the above-captioned cases by Baker & Hostetler LLP, along with certain other professionals.
2. The Reorganized Debtors have engaged new counsel at Pillsbury Winthrop Shaw Pittman LLP (“Pillsbury”). Hugh M. Ray, III and L. James Dickinson of Pillsbury entered an appearance in the above-captioned cases at Docket No. 866.
3. The Reorganized Debtors consent to the withdrawal of Baker & Hostetler LLP.

¹ The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor’s federal tax identification number, are: Invacare Corporation (0965); Freedom Designs, Inc. (4857); and Adaptive Switch Laboratories, Inc. (6470). The corporate headquarters and the mailing address for the Reorganized Debtors is 1 Invacare Way, Elyria, Ohio 44035.

WHEREFORE, Baker & Hostetler LLP respectfully requests that this Court authorize the proposed withdrawal and grant any other and further relief that this Court deems appropriate.

Houston, Texas
Dated: March 25, 2025

Respectfully submitted,

/s/ Jeremy S. Dunnaback

BAKER & HOSTETLER LLP

Jeremy S. Dunnaback (admitted pro hac vice)

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Co-Counsel to the Reorganized Debtors

Certificate of Service

I certify that on March 25, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Matthew D. Cavanaugh

Matthew D. Cavanaugh